



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*86 Chambers Street
New York, New York 10007*

April 29, 2024

Via ECF

Honorable Jessica G. L. Clarke
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St.
New York, NY 10007-1312

Re: *Intercept Media, Inc. v. U.S. Air Force, et al.*, 24 Civ. 601 (JGLC)

Dear Judge Clarke:

This Office represents the U.S. Air Force, U.S. Department of State, U.S. Treasury, and U.S. Navy (collectively, the “Government”) in the above-referenced case brought by Plaintiff Intercept Media, Inc. (“Plaintiff”) pursuant to the Freedom of Information Act (“FOIA”), 5 U.S.C. § 552. As directed by the Court (Dkt. No. 12), the parties are continuing to meet and confer in an attempt to resolve the issues in this action without the need for motion practice.

Briefly, Plaintiff seeks records from four Government agencies or components related to several topics that broadly concern “the September 26, 2022, underwater demolition of and resulting gas leaks from the Nord Stream 1 and Nord Stream 2 natural gas pipelines in the Baltic Sea.” Compl., Dkt. No. 1, ¶ 1. Since the filing of their last status report (Dkt. No. 17), the parties have continued to discuss Plaintiff’s requests and certain specific issues concerning how to interpret the requests and construct searches to locate responsive documents.

Because they continue to discuss the issues in good faith, the parties jointly request that they provide a further status report by May 29, 2024 (30 days from today) and that Defendant’s deadline to answer be extended for a corresponding amount of time, from May 15, 2024, to June 15, 2024.

The parties thank the Court for its consideration of these matters.

Respectfully submitted,

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Southern District of New York

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